



September 12, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, CC Docket No. 02-6; WC Docket 13-184,

Dear Ms Dortch,

AdTec, Administrative and Technical Consulting, Inc., is an Indiana based consulting firm engaged in the business of Universal Service Fund E-Rate Consultation. There are seven offices in Indiana (Centerville, Batesville, Bloomington, Chesterton, New Market, West Harrison, and Westfield) and offices in Bellingham, Washington; Belleville, Michigan and Bowling Green, Ohio. Our 380 plus E-Rate clients are schools and libraries in the states of Indiana, Illinois, Michigan, Missouri, Ohio, Oregon, South Carolina, Virginia, and Wyoming. In addition, we are contracted by the State of Indiana to complete the E-Rate applications for those schools and libraries participating in the state Internet access backbone. AdTec has been assisting schools and libraries in the E-Rate program since its inception in 1998.

As the FCC moves forward with considering the myriad of changes proposed in the NPRM I believe:

A modernized E-Rate program must standardize the collection of NSLP data.

- Paragraph 279-282, 284 seeks comments on the benefits and drawbacks to require schools and libraries to use state reported NSLP data for purposes of determining their discount rate. **Response:** I support the Commission's proposal "to standardize USAC's collection of NSLP data by requiring schools to use NSLP information..." This proposal would help ensure the program's integrity by protecting against waste, fraud, and abuse. The NSLP data is reviewed by many sets of eyes at the local, state, and federal level since this data is used for other federal and state programs that require a determination of the level of economic disadvantage. This is a good thing because anomalies in the data can be addressed sooner rather than later. As noted in Para 280 the data for the current school year is available by November 15th of each year. I am aware some states do use data to establish E-rate discounts that are a year behind. In these cases I recommend that the State E-rate Coordinator, upon petition from the school and/or school district, verify the change in data through a written verification letter since more current data is readily available.

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I highly recommend the Commission limit the "use of federally approved alternative mechanism, such as a survey, as a proxy for poverty when calculating E-rate discounts rates" for only those schools that do not participate in the NSLP. I also recommend a safety check be built into the survey method for program consistency. The Commission should require the State E-rate Coordinator to provide a written verification letter after review of the survey methodology and data analysis. The reason for this letter of verification would be to avoid error. The Commission cannot assume that local school officials are necessarily trained in sampling and analyzing the data. The Commission has the responsibility to assure all program participants that the use of results of a federally approved alternative mechanism meets a minimum standard of obtaining reliable information from which to draw valid conclusions. Furthermore, the Commission needs to assure all program participants that the survey data is not being "fixed" to yield findings the person conducting the survey had hoped for, or else suppressed because they are contrary to what was desired. Such dishonest manipulation of the data is inexcusable and leads to waste, fraud, and abuse.

Should you have further questions about AdTec, Inc. or information contained within this letter, please do not hesitate to contact me at charlie@adtecerate.com.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Charles F. Hobbs". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charles F. Hobbs, PhD
President